

Clear Rate Communications, Inc.

Do Not Call Policy

Introduction:

It is the intention of Clear Rate Communications, Inc. ("Clear Rate"), its affiliates, managers, employees and agents to maintain the highest standards possible in the course of its business. Toward this end, Clear Rate does not intend to violate the privacy rights or wishes of any person who does not want to be called by our organization. The following policy is mandatory in all solicitations and campaigns by our company.

Do Not Call Policy (TCPA 47 USCS § 227)

Consumers may request by telephone or in writing, that our company stop calling them and place their name on our company-specific Do Not Call list. Although we may ask for their names, address and telephone number, **we will accept a request even if the consumer only wishes to provide their telephone number.** Consumers have the right to have calls stopped and to be put on our Do Not Call list, even if they are still a customer. The specific reason or severity of the tone of the request is not important. ALL REQUESTS WILL BE HONORED.

When we receive a request, the telephone number is added to our Do Not Call list within (7) business days. In some cases it may take up to (14) business days for the consumer's telephone to be removed from other company wide calling lists. A Do Not Call request stays on our list for at least 5 years. If the consumer moves, changes their telephone or adds additional telephone numbers, the consumer must provide us with the new telephone number in order for us to prevent calls to that number. We will not share the information customers provide without their prior permission, except affiliated companies or subsidiaries.

Other companies may perform telemarketing services on our behalf. In this case, we will also forward our updated Do Not Call list(s) to these companies.

All employees and agents that engage in outbound telephone solicitation are trained in this policy and made aware of these procedures before they are allowed to place calls to consumers. Customer Service representatives are also trained pursuant to this policy before they are allowed to take calls from customers. Managers, supervisors, or trainers must review this policy with these employees annually. Re-certification of training occurs on an as needed basis.

If the consumer notifies us that they have received a telephone call from us after they have already requested to be placed on our Do Not Call list, we will apologize for the intrusion and have a manager or supervisor investigate. The manager or supervisor will also personally confirm that the telephone number is on the Do Not Call list. Upon request, we will mail the consumer a confirmation that their telephone number is on the list.

The Federal Trade Commission offers a free service to consumers that allow them to place their residential phone number on a National Do Not Call Registry. This service will reduce the number of telemarketing calls received. Consumers may add their residential phone number to the list either by calling 888-382-1222 or through the internet at www.donotcall.gov. It may take several weeks before they notice a reduction in calls.

The methods and procedures in this Do Not Call policy are reviewed by Clear Rate's Legal team on a regular basis, as the TCPA atmosphere is constantly changing. As the interpretation of the TCPA changes, so will Clear Rate's Do Not Call Policy.

If you have questions, comments or concerns, please contact our customer service department at 877-877-4799 or support@clearrate.com.

Procedures for third party telemarketers:

Clear Rate DNC requests will be consolidated and forwarded to our 3rd party telemarketer. The DNC request file will minimally contain the consumer's 10 digit telephone number and the date of request. Any consumer complaints regarding repeat calls subsequent to a DNC request will be reported to Clear Rate's Do Not Call Administrator. Consumer requests for a copy of our DNC policy will be fulfilled by registered mail within 14 business days. Records of this action will be forwarded to our Do Not Call Administrator.

Procedures for employees:

Employees who receive a written, e-mail or telephone DNC request will enter the DNC request in the following manner:

- The request will be forwarded to our Do Not Call administrator who is responsible for maintaining the internal DNC list.
- The Do Not Call administrator will log the phone number and date of the request.
- At the end of the day, the Do Not Call administrator will compile all of the requests from that day, and forward them to our 3rd party telemarketer, as well as, our Do Not Call Administrator.

- Both Clear Rate and its telemarketers will honor the request for 5 years after the request is made.

Requests for our DNC Policy will only be fulfilled by US mail. Policies must be sent within 14 business days of consumer's request. If someone asks for a copy of our DNC policy, that request will be forwarded to our Do Not Call administrator, immediately. The Do Not Call administrator shall print a copy of our policy within 14 business days and mail it by US mail to the requestor at the address provided. The date of mailing shall be logged in the internal DNC spreadsheet.

Established Business Relationship (EBR) Calls:

During calling campaigns to our existing customers, someone may express concern that we are calling them even though they have placed their number on the national or state DNC list. Many customers do not understand that calls to them are exempt (within regulatory parameters) from the DNC rules as long as they have not previously asked to be placed on our internal DNC list.

Request for Do Not Call Policy

Our Do Not Call Policy is available on our website at www.clearrate.com. Any person who requests a copy of our do not call policy is entitled to receive it as soon as possible. The requestor will be sent a copy in accordance with these practices and procedures.